

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

VIVIAN BERT, et al.,

Plaintiffs,

V.

AK STEEL CORPORATION,

Defendant.

CASE NO. C-1-02-467

Judge Beckwith

Magistrate Judge Hogan

JOINT MOTION FOR ONE-WEEK EXTENSION
FOR EXCHANGE OF EXPERT REPORTS

The Plaintiffs and the Defendant respectfully move this honorable Court for an Order extending the deadlines for exchange of their expert reports by one week.. As grounds for this Motion, the parties state as follows:

1. On January 4, 2005, this Court entered an Order establishing the following dates for the parties to exchange expert reports:

- Plaintiffs' Expert Reports February 22, 2005
- Defendant's Expert Reports March 22, 2005
- Plaintiffs' Expert Replies April 22, 2005

2. While the experts have been working hard to review and analyze the voluminous documents that are involved in this case, it is going to be difficult for them to meet the present deadlines established for the exchange of expert reports. The parties have, therefore, agreed that a one-week extension of the dates on which they will exchange expert reports is warranted.

3. Further, a one-week extension of the dates on which the parties will exchange expert reports will not disturb the two other dates established in this Court's January 4, 2005 Order. In other words, as established by this Court's January 4, 2005 Order, May 23, 2005 will remain the deadline for the end of class discovery, and June 7, 2005 will remain the deadline for the filing of the Plaintiffs' Motion for Class Certification.

WHEREFORE, premises considered, the parties jointly request that this Court extend by one-week the deadlines for exchange of their expert reports as follows:

- **Plaintiffs' Expert Reports** **March 1, 2005**
- **Defendants' Expert Reports** **March 29, 2005**
- **Plaintiffs' Expert Replies** **April 29, 2005**

Respectfully submitted this the 11th day of February, 2005,

s/ ***Susan Donahue***

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